

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ROUNDTABLE HEALTHCARE PARTNERS,
L.P., a Delaware Limited Partnership,

Plaintiff,

v.

ANGIOTECH PHARMACEUTICALS (U.S.),
INC., a Washington Corporation,

Defendant.

**NOTICE OF MOTION FOR PARTIAL
JUDGMENT ON THE PLEADINGS**

Civil Action No.: 08-CV-02968 (MGC)

Filed Electronically

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law of Defendant Angiotech Pharmaceuticals (U.S.), Inc. in Support of Defendant's Motion for Partial Judgment on the Pleadings, and the pleadings herein, Defendant Angiotech Pharmaceuticals (U.S.), Inc., will move this Court, before the Honorable Miriam Goldman Cedarbaum, United States District Judge, on Thursday, July 31, 2008, at 9:30 a.m., or as soon thereafter as counsel may be heard, for an order, pursuant to Rule 12(c) of the Federal Rules of Civil Procedure, dismissing with prejudice certain portions of Counts I and II of the Complaint, and for such other relief as the Court deems proper and just.

Pursuant to 3.C of the Individual Practices and Procedures of Judge Cedarbaum, Plaintiff RoundTable Healthcare Partners, L.P.'s answering papers must be received by Angiotech by noon on Wednesday, July 23, 2008.

DATED: July 9, 2008
New York, NY

Respectfully submitted,

HELLER EHRMAN LLP

By /s/ Warren S. Rheaume

Warren J. Rheaume (*pro hac vice*)
warren.rheaume@hellerehrman.com
Malaika M. Eaton (*pro hac vice*)
malaika.eaton@hellerhrman.com
Heller Ehrman LLP
701 Fifth Ave., Suite 6100
Seattle, WA 98104-7098
Tel: (206) 447-0900
Fax: (206) 447-0849

Andrew Levine (AL 3552)
andrew.levine@hellerehrman.com
Heller Ehrman LLP
Times Square Tower
7 Times Square
New York, NY 10036-6524
Tel: (212) 832-8300
Fax: (212) 763-7600

*Attorneys for Defendant
Angiotech Pharmaceuticals (U.S.), Inc.*